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April 5, 2019

**VIA ELECTRONIC FILING**

Honorable Comer H. Randall  
Chairman  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order  
**Docket No. 2018-319-E**

Dear Chairman Randall:

ORS advises the Commission of its concern about its ability to present its cost of capital witness, David Parcell. ORS respectfully requests that the Commission assist the parties in arriving at a fair decision about the order of witnesses.

The time-constraint problems relate to DEP's anticipated length of its case. DEP bases its current estimates for the length of the pending hearing on the DEC hearing. DEP has advised that it intends to include three witnesses--Jay Oliver, John Panizza, and Kendra Ward--who ORS believes testify to uncontested issues. The testimony on these topics was stipulated to in the DEC hearing, and those same issues are not in dispute in the DEP case. As an example, the DEP case would proceed more expeditiously with the Grid Mod witness not being called. This DEP decision imposes an unnecessary and unreasonable time constraint on ORS and other parties. Even if DEP is allowed to present these witnesses, they should not be called in DEP's case in chief if doing so would impose time constraints and due process burdens on ORS's ability to present its case in an understandable and effective fashion.

ORS first proposed to the parties that it was requesting a date certain of April 15 for witness Parcell on March 22. Duke did not advise the parties until April 1 that its proposed approach to presenting its direct case would likely extend into April 16<sup>th</sup>.

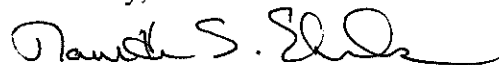
ROE Witness Parcell is a vital ORS witness. Witness Parcell's testimony has significant importance on the rates that will ultimately be charged to DEP's customers.

The proposed additional hearing time now sought by DEP threatens to interfere with ORS's ability to present its case on behalf of Duke customers. ORS Witness Parcell has a hard schedule conflict and can only be available to testify on April 15. ORS first made DEP and all other parties aware of this scheduling request on **March 22, 2019**.

ORS is also very concerned about the additional costs and expenses of compelling its experts to be present to offer their testimony at an unspecified time. Mr. Witliff is available on April 16<sup>th</sup>. These costs will ultimately be charged to customers. *See* § S.C. Code Ann. 58-4-100. ORS seeks to avoid payment of potentially thousands of dollars of unnecessary fees and expenses for the presentation of its witnesses.

For these reasons, ORS requests the assistance of the Commission to ensure that ORS witness Parcell is able to testify on April 15<sup>th</sup>.

Sincerely,

A handwritten signature in black ink, appearing to read "Nanette S. Edwards". The signature is fluid and cursive, with a large, stylized "N" and "S".

Nanette S. Edwards

cc: Joseph Melchers, Esquire (via E-mail)  
All Other Parties of Record (via E-mail)